

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BRENDAN SULLIVAN,

Plaintiff,

v.

SUNG KOOK (“BILL”) HWANG, ARCHEGOS  
CAPITAL MANAGEMENT, LP, ARCHEGOS  
CAPITAL MANAGEMENT, LLC, THE GRACE  
AND MERCY FOUNDATION, INC., ARCHEGOS  
FUND LP, EWM LLC, d/b/a EWM GLOBAL, ANDY  
MILLS, DIANA PAE, BRIAN JONES, SCOTT  
BECKER, and PATRICK HALLIGAN,

Defendants.

Index No. 1:22-cv-05675

ECF Case

Hon. Paul G. Gardephe

**DECLARATION OF BRENDAN SULLIVAN**

I, Brendan Sullivan, do hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I submit this declaration in connection with the above-captioned action, and for the purpose of establishing my domicile in the State of Tennessee for diversity jurisdiction purposes, under 28 U.S.C. § 1332. All statements contained herein are true based on my personal knowledge.

2. I am a resident of and domiciled in the State of Tennessee. I live in Franklin, Tennessee in Williamson County, with my wife, Perryn Sullivan and children, at 517 Pearre Springs Way (“Tennessee Home”). In the fall of 2021, my wife and I moved our family from New York to Tennessee to be closer to family and to pursue new employment opportunities in Tennessee.

3. I have lived in Tennessee since the fall of 2021, and I plan on continuing to live in Tennessee for the foreseeable future. I intend to remain a Tennessee resident and I have never intended to move to another state since I moved to Tennessee in 2021.

4. In July 2021, we listed our house in Mattituck, NY for sale, and in September 2021 we sold our home in New York City, NY.

5. In November 2021, my family and I moved from New York to Tennessee, and leased a single-family home at 712 Mockingbird Drive in Franklin, Tennessee. We signed a twelve-month lease for 712 Mockingbird Drive that began on November 15, 2021 and ended on November 30, 2022. We lived in this home during this period. Attached hereto as Exhibit A is a true and correct copy of our lease, signed by myself, my wife, and the landlord, on October 21, 2021.

6. In March 2022, we sold our Mattituck, NY house.

7. In June 2022, I registered my 2020 Kia Telluride in Tennessee, at our rental home at 712 Mockingbird Drive in Franklin, Tennessee. On June 2, 2023, I renewed vehicle registration, which will expire on June 30, 2024. I intend to renew my registration again at that time. Attached hereto as Exhibit B is a true and correct copy of my current certificate of vehicle registration from the Tennessee Department of Revenue. It lists my current address as 517 Pearre Springs Way, Franklin, TN 37064.

8. In July 2022, I was hired by the Vanderbilt University's Office of Investments, located next to Vanderbilt University's main campus in Nashville, Tennessee. Attached hereto as Exhibit C is a press release that was published on Vanderbilt's website on April 5, 2023, stating that I joined the Office of Investments in July 2022. This position requires me to be physically present in the office a majority of each week.

9. In October 2022, my wife and I purchased our Tennessee Home. Attached hereto as Exhibit D is a true and correct copy of the warranty deed, signed by the John Wells, State of Tennessee Notary Public, on October 24, 2022, and by Abby Benson, State of Tennessee Notary Public, on October 25, 2022, in connection with the purchase of our Tennessee Home. The home was purchased by my wife, but I reside there along with my wife and children. This exhibit also includes a receipt showing the transfer tax, recording fee, DP fee, and register's fee for the home purchase.

10. Additionally, attached hereto as Exhibit E is a utility bill for our home from Middle Tennessee Electric, dated June 4, 2023, for the May 3, 2023 to June 3, 2023 billing period.

11. My wife and I do not own or lease any property in any other state besides Tennessee.

12. As stated above, since November 2021 to the present, my wife and I have been legal residents of Tennessee. As such, when the above-captioned action was filed on July 5, 2022, my wife and I were domiciliaries of Tennessee, and we remain domiciliaries of Tennessee to the present and continuing.

Dated: June 29, 2023  
Franklin, TN

Brendan Sullivan

BRENDAN SULLIVAN

Signature:



Brendan Sullivan (Jun 29, 2023 10:00 CDT)